

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT BECKLEY**

MATTHEW GIBSON,

Plaintiff,

vs.

Civil Action No. 5:21-cv-00181

Honorable Frank W. Volk

LOUISE E. GOLDSTON, individually,  
COUNTY COMMISSION OF RALEIGH  
COUNTY, a political subdivision,  
JEFF MCPHAKE, individually,  
BRIAN WHITE, individually,  
BOBBY STUMP, individually,

Defendant.

**PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT  
LOUISE E. GOLDSTON'S MOTION FOR SUMMARY JUDGMENT**

For the same reasons cited in his Memorandum in Support of His Motion for Summary Judgment Against Defendant Louise E. Goldston, Plaintiff opposes Defendant Goldston's motion for summary judgment, and hereby incorporates by reference the arguments and exhibits asserted therein in support of his response.

WHEREFORE, Plaintiff respectfully requests summary judgment be granted in his favor, and that Defendant Goldston's motion for summary judgment be denied, and for such other and further relief as this Court deems just and fit.

MATTHEW GIBSON,  
By Counsel

/s John H. Bryan

John H. Bryan (WV Bar No. 10259)

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**CERTIFICATE OF SERVICE**

I, John H. Bryan, do hereby certify that I have delivered a true copy of the foregoing  
PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT LOUISE E. GOLDSTON'S  
MOTION FOR SUMMARY JUDGMENT has been served upon counsel of record by using the  
CM/ECF System, this the 4th day of April, 2022 and addressed as follows:

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/s John H. Bryan

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